

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MICHAEL BROWN, SR., AND LESLEY)
McSPADDEN,)
Plaintiffs,)
vs.) Cause No: 4:15-cv-00831-ERW
CITY OF FERGUSON, MISSOURI,) JURY TRIAL DEMANDED
FORMER POLICE CHIEF THOMAS)
JACKSON, AND FORMER POLICE)
OFFICER DARREN WILSON,)
Defendants.)

MEMORANDUM REGARDING WITNESSES

COMES NOW Defendants, City of Ferguson, Missouri, Former Police Chief Thomas Jackson, and Former Police Officer Darren Wilson (“Defendants”), by and through their attorneys, and for their Memorandum Regarding Witnesses, state as follows:

Pursuant to this Court’s Order, Defendants are required to disclose the identities of known witnesses that testified before the grand jury in the matter of *State of Missouri v. Darren Wilson*. At this time, Defendants have knowledge that the following individuals testified before the grand jury:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
[REDACTED]

6. [REDACTED]

7. [REDACTED]

8. [REDACTED]

9. [REDACTED]

10. [REDACTED]

Defendants will supplement this memorandum should they obtain knowledge of additional witnesses.

/s/Peter J. Dunne

Peter J. Dunne #31482
Robert T. Plunkert #62064
PITZER SNODGRASS, P.C.
Attorneys for Defendants City of Ferguson,
Missouri, Former Police Chief Thomas Jackson,
and Former Police Officer Darren Wilson
100 South Fourth Street, Suite 400
St. Louis, Missouri 63102-1821
(314) 421-5545
(314) 421-3144 (Fax)
Email: dunne@pspclaw.com
Email: plunkert@pspclaw.com

I hereby certify that a copy of the foregoing filed electronically with the Clerk of the Court this 7th day of March, 2016, to be served by operation of the Court's electronic filing system upon the following:

Anthony D. Gray
7710 Carondelet Ave., Suite 303
Clayton, Missouri 63105
agray@johnsongraylaw.com
Telephone: 314-385-9500
Fax: 314-594-2052
Attorney for Plaintiffs

Daryl D. Parks (pro hac vice)
Benjamin L. Crump (pro hac vice)
Jasmine O. Rand (pro hac vice)
240 North Magnolia Drive
Tallahassee, Florida 32301
dparks@parkscrump.com
bcrump@parkscrump.com
jasminerand@parkscrump.com
Telephone: 850-222-3333
Fax: 850-224-6679
Co-Counsel for Plaintiffs

Ronald S. Sullivan, Jr. (pro hac vice)
6 Everett Street, Suite 5116
Cambridge, Massachusetts 02138
prof.ron.sullivan@gmail.com
Telephone: 617-496-4777
Fax: 617-496-2277
Co-Counsel for Plaintiffs

Greg Kloepel
9620 Lackland Road
St. Louis, Missouri 63114
gregkloepel@kloepplaw.com
Telephone: 314-423-8003
Fax: 314-423-8054
Co-Counsel for Defendant Darren Wilson

Cynthia Hoemann
Linda S. Wasserman
Office of County Counselor
St. Louis County Government Center
41 S. Central Ave., 9th Floor
Clayton, Missouri 63105
choemann@stlouisco.com
lwasserman@stlouisco.com
Telephone: 314-615-7042
Fax: 314-615-3732
Attorneys for Movant St. Louis County Office
of the Prosecuting Attorney

/s/ Peter J. Dunne